IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LAP DISTRIBUTORS, INC., a

Pennsylvania corporation, individually and on behalf of all others similarly situated,

Plaintiff,

v.

Case No. 2:19-cv-02265-JD

QUADISCO, INC. D/B/A QUADIS VOICE & DATA SOLUTIONS, a

Pennsylvania corporation,

Defendant.

PLAINTIFF'S LOCAL COUNSEL'S MOTION TO WITHDRAW APPEARANCE

Deborah R. Gross, Esquire, of Kaufman, Coren & Ress, P.C. (the "Firm"), hereby brings this motion to withdraw her and the Firm's appearance as local counsel for Plaintiff LAP Distributors, Inc. pursuant to Local Rule 5.1(c), and in support thereof states the following:

- 1. On June 3, 2019, local counsel entered their appearance in this matter.
- 2. Local counsel has had difficulty communicating with attorney Adam Savett and being kept informed of the status of this matter.
- 3. Plaintiff will not be harmed or prejudiced by the granting of this motion as Plaintiff is continuing to be represented by attorney Adam Savett.

WHEREFORE, local counsel respectfully requests that this Honorable Court enter an order granting permission to withdraw as one of Plaintiff's counsel.

Respectfully submitted,

KAUFMAN, COREN & RESS, P.C.

Dated: June 4, 2020 BY: /s/ Deborah R. Gross

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